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Bohdan J. Zelechiwsky
Attorney at Law

April 20, 2015

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, Pennsylvania 17105

**In re: Pennsylvania Public Utility Commission v. Mickey Jadallah DBA ABC
Moving Service LLC
Docket No. C-2015-2437081**

Dear Ms. Chiavetta

Please be advised I have been retained to represent Defendant, Mickey Jadallah in the above captioned matter. Enclosed herewith, please find Answer and New Matter to Complaint.

Very truly yours,

Bohdan J. Zelechiwsky, Esq.

BJZ/rm

cc: Wayne T. Scott
Mickey Jadallah

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APR 02 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

148350

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION
BUREAU OF INVESTIGATION AND ENFORCEMENT

Plaintiff

v.

MICKEY JADALLAH DBA ABC MOVING SERVICE LLC
2438 S 5th STREET REAR
ALLENTOWN PA 18103

Defendant

DOCKET NO. C-2015-2437081

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APR 02 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

ANSWER AND NEW MATTER TO COMPLAINT

COMES NOW, Defendant, Mickey Jadallah DBA ABC Moving Service LLC and files the following Answer and New Matter to the above captioned Complaint.

1. Admitted.
2. Denied. After reasonable investigation, answering Defendant is without knowledge as to the conversation allegedly occurring between Nancy Denver and P.U.C. Enforcement Officer Benjamin Groves and the same is denied and strict proof thereof is demanded at hearing. Defendant's status as a "certificate of public convenience" holder constitutes a conclusion of law to which no response is required and proof of the same is demanded at hearing.
3. Denied. Weather Defendant is "holding out" as a "transporter of household goods" is a conclusion of law to which no response is required.

WHEREFORE, your Defendant, Mickey Jadallah DBA ABC Moving Service LLC respectfully prays that the Complaint be denied and dismissed.


NEW MATTER

4. Paragraphs one (1) through three (3) are incorporated herein by reference as though set forth in full.

5. Defendant did not undertake or perform any work for one Nancy Denver necessitating PUC licensure or approval.
6. At all times material to the PUC Complaint, Defendant believed he processed all valid, local, state, and federal authority necessary.

WHEREFORE, your Defendant, Mickey Jadallah DBA ABC Moving Service LLC respectfully prays that the Complaint be denied and dismissed.

Respectfully submitted,



BOHDAN J. ZELECHIWSKY, ESQUIRE
PA I.D. #26892
527 Hamilton Street, Lower Level
Allentown, PA 18101
(610) 841-8690

VERIFICATION

I verify that the statements made in the foregoing document are true and correct. I understand that this statement is made subject to the penalties of 18 PA.C.S. Section 4904 relating to unsworn falsification to authorities.

DATED: 4-20-15

15/BZ
BOHDAN J. ZELECHIVSKY, ESQ.

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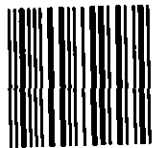
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SECRETARY'S BUREAU



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17105

U.S. POSTAGE
PAID
ALLENTOWN, PA
18101
APR 20, 15
AMOUNT

\$3.51

R2304E105658-05



\$0.49 0

US POSTAGE
FIRST-CLASS
062S0009272493
FROM 18101

B77516.11

stamps



Zelchivsky Law Office
527 Hamilton St.
Allentown, Pa. 18101

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL®



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Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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